Case 1:25-cr-00111-PKC Document 28 Filed 04/24/25 Page 1 of 1

Case 1:25-cr-00111-PKC Document 27 Filed 04/24/25 Page 1 of 1

Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street, 10th Floor New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara Giwa Executive Director Jennifer L. Brown Attorney-in-Charge

April 24, 2025

Honorable P. Kevin Castel

United States District Judge
Southern District of New York

Re: United States v. Daniel Holmes, 25 Cr. 111 (PKC)

Dear Judge Castel:

I write to respectfully request that the Court permit Daniel Holmes to attend his sister's birthday

party at a bar in Brooklyn this Saturday, April 26, from 6:00 p.m. to 12:00 a.m. Pretrial Services

notes that "[p]er [its] home detention policy we object to social requests but note [Mr. Holmes's] notes that "[p]er [its] home detention policy we object to social requests, but note [Mr. Holmes's]/ recent compliance since being placed on GPS." The Government defers to Pretrial Services.

As background, Mr. Holmes is charged with conspiracy and substantive mail theft offenses and has a next scheduled court date of June 12. His bond conditions include, as relevant, home detention with electronic monitoring. As noted by Pretrial, Mr. Holmes has been compliant with his bond conditions since being placed on electronic monitoring in January of this year. Mr. Holmes and his sister—who is one of his bond cosigners—are very close and so Mr. Holmes looks forward to the opportunity to celebrate her birthday with her.

Thank you for your attention to this request.

Respectfully submitted,

/s/ Jonathan Marvinny Jonathan Marvinny Assistant Federal Defender 212,417.8792 jonathan marvinny@fd.org

Francesca Piperato, Pretrial Services Getzel Berger, Esq.